# **REMARKS**

Claims 1-32 are pending in the present application. Claims 1-18 are withdrawn due to a restriction requirement. Claims 19-32 are amended by this response. Claims 1 and 19 are independent claims.

#### Specification

The specification is objected to as having a non-descriptive title. Applicants hereby amend the title of this Application. Accordingly, reconsideration and withdrawal of this objection is respectfully requested

# Claim Rejections - §112

Claims 20 – 32 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, the phrase "an electronic module" is objected to. Applicants hereby amend claims 20 – 32 to recite "the electronic module" as suggested in the Office Action. Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

### Claim Rejections - §102(b)

Claims 19 – 32 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,306,670 to Mowatt ("Mowatt"). Insofar as it pertains to the presently pending claims, this rejection is respectfully traversed.

#### Claim 19

Independent claim 19 pertains to an electrical module that requires, in pertinent part, "an insulating-material layer, which has a first surface and a second surface; at least one hole or recess in the insulating-material layer, which opens out onto the first surface; at least one component inside the at least one hole or recess, wherein the component includes contact zones on the side of the component that faces the first surface of the insulating-material layer, and further wherein the component is positioned in such a way that the contact zones are located at a specified distance from the level of the first surface of the insulating-material layer; a conductive-pattern layer, which runs on the first surface of the insulating-material layer and extends on top of the at least one hole or recess in the insulating-material layer and at the location of the contact zones of the components; a hardened adhesive layer in the hole or recess in the insulating-material layer, between the component and the conductive-pattern layer; and an electrical contact area between the conductive-pattern layer and the contact zones of the component, where said contact area is formed by conductive-material formations penetrating the adhesive layer."

Viewed in the context of Mowatt, the conductive pattern layer of the present invention corresponds to an interconnect structure 130 in Mowatt and the insulating-material layer of the present invention corresponds to a surface layer of printed wiring board (PWB) laminate 10 in Mowatt. The Applicants respectfully note that unlike the present invention, Mowatt's conductive pattern layer 130 is disposed on the Kapton layer 126 laminated onto the upper surface of a copper layer 12. Furthermore, the copper layer separates the Kapton layer 126 from

the PWB laminate 10, so the 10 and 126 layers of Mowatt may not be regarded as part of an overall insulating-material layer, since they are separated by a conductor. Furthermore, a hole or recess accommodating a component 56 does not extend into the Kapton layer in Mowatt and the hardened adhesive layer 22 of Mowatt is disposed on the opposite face of the component 56 instead of being between the component 56 and the conductive-pattern layer 130.

Although Mowatt may have multiple layers of insulation and cladding disclosed, the Examiner may not switch definitions during the course of interpreting a single claim. The conductive pattern, insulating material, and hardened adhesive layers of independent claim 19 are individual, specifically-defined portions of the invention and have a consistent interpretation and meaning each time they are referred to in claim 19. The Examiner may not regard multiple, disparate, and non-contiguous material layers in Mowatt as satisfying all the structural and operational limitations specifically associated with any single material layer of independent claim 19.

# Summary

At least in view of the above, Applicants respectfully submit that Mowatt fails to teach or suggest "a hardened adhesive layer in the hole or recess in the insulating-material layer, between the component and the conductive-pattern layer" as required by independent claim 19. Applicants therefore submit that Mowatt is deficient in its teaching with respect to independent claim 19 and all claims depending therefrom because Mowatt fails to teach or suggest each and every aspect of the claimed invention. Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

# Conclusion

In view of the above amendment and remarks, Applicants believe the pending application is in condition for allowance on all pending claims. Thus, the Examiner is respectfully requested to reconsider the outstanding rejections and issue a Notice of Allowance in the present application.

However, should the Examiner believe that any outstanding matters remain in the present application, the Examiner is requested to contact Applicants' representative, Naphtali Matlis (Reg. No. 61,592) at the telephone number of the undersigned in order to discuss the application and expedite prosecution.

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Respectfully submitted,

Michael K. Mutter

Registration No.: 29,680

BIRCH, STEWART, KOLASCH & BIRCH, LLP

8110 Gatehouse Rd

Suite 100 East

P.O. Box 747

Falls Church, Virginia 22040-0747

(703) 205-8000

Attorney for Applicants